



**ROBECO**

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139576  
*Chemicals, Inc.*

OVER 70 YEARS

CERTIFIED - RETURN RECEIPT

May 12, 1989

U. S. Environmental Protection Agency  
Region III  
841 Chestnut Building  
Philadelphia, PA 19107

Attention: Mr. James Heenehan, EPA Office of Regional Counsel

RE: Request for Information Pursuant to Section 104 of CERCLA and  
Section 3007 of RCRA for the Artel Chemical Site, Nitro,  
West Virginia

Dear Mr. Heenehan:

Robeco Chemicals, Inc. is a small-sized trading Company, not a manufacturer, buying and selling products for sale abroad, and importing products abroad for sale in the United States.

Our Attorney, Mr. Thomas Epstein, advised us that he had informed you by phone, that during the entire period of our dealing with the Artel Corporation, our Company's business relationship was that of a buyer of some of the products which they were manufacturing. All of Artel's products purchased by us were for shipment to export piers or airports for delivery abroad to customers of our Company. No products were made for us on a toll basis.

None of the products that we purchased from Artel were for inventory, and were purchased from Artel solely to fill orders from abroad. Consequently, we did not see or handle these products and they were shipped overseas in the same manner as delivered by Artel.

We enclose herewith copies of invoices from Artel covering the products so purchased.

The only exception to the above, related to accommodation purchases we made for Artel, aggregating less than \$10,000, when Artel was short of funds and needed material. These purchases were not to make any items other than those normally manufactured by Artel.

We submit that our business relationship with Artel did not contribute to environmental problems in question and that these environmental problems should not involve us.

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We are sending copies of the enclosures to Acumenics Research & Technology, Inc. and trust we will be relieved from the substantial amount of time and expense in furnishing the information and documentation requested of companies which did contribute to Artel's environmental problems.

Very truly yours,

ROBECO CHEMICALS, INC.

  
A. D. Bercow  
Vice President

ADE/gl  
encs.

✓ cc: Acumenics Research & Technology, Inc.

cc: Thomas Epstein  
Epstein & Furman  
261 Madison Avenue  
New York, N.Y. 10016

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